1 2 3 4 5 6	Tanya E. Moore, SBN 206683 MOORE LAW FIRM, P.C. 332 North Second Street San Jose, California 95112 Telephone (408) 298-2000 Facsimile (408) 298-6046 Email: service@mission.legal Attorney for Plaintiff, Albert Dytch		
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8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
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11	ALBERT DYTCH,) No. 3:17-cv-00438-SI	
12	Plaintiff,) STIPULATION FOR DISMISSAL OF	
13	VS.	ENTIRE ACTION WITH THE COURT'S RETENTION OF JURISDICTION TO	
15	ANTONIO MAGANA dba FLACOS, et al.,) RESOLVE PLAINTIFF'S CLAIM FOR) ATTORNEYS' FEES AND COSTS	
16	Defendants.		
17		(PROPOSED] ORDER	
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	STIPULATION FOR DISMISSAL OF ENTIRE ACTION; [PROPOSED] ORDER		

Page 1

1	IT IS HEREBY STIPULATED by and between Plaintiff, Albert Dytch ("Plaintiff"),		
2	and Defendant, Maxaco, LLC ("Defendant," and together with Plaintiff, "the Parties"), all		
3	remaining parties to this action, by and through their respective counsel, that pursuant to		
4	Federal Rule of Civil Procedure 41(a)(2), the above-captioned action be dismissed with		
5	prejudice.		
6	IT IS FURTHER STIPULATED by the Parties that the Court shall expressly retain		
7	jurisdiction over this matter for the purpose of adjudicating any subsequent motion Plaintiff		
8	may bring to recover his attorneys' fees and costs ("Fees Motion"). Any Fees Motion shall be		
9	filed within 45 days of the date the Court issues its Order on this stipulation.		
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11		RE LAW FIRM, P.C.	
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13	· III	eya E. Moore E. Moore	
14	1 allya	ey for Plaintiff,	
15	Albert	Dytch	
16		er A. Magganas	
17	· 11	A. Magganas	
18	' 11	ey for Defendant,	
19	Maxad	o, LLC	
20			
21	ATTESTA	TION	
22		een obtained from each of the individual(s)	
23	whose electronic signature is attributed above.		
24	/s/ Tan	ya E. Moore	
	Tanya	E. Moore ey for Plaintiff,	
25	Albert	Dytch	
26	?		
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1	<u>ORDER</u>		
2	The Parties having so stipulated and good cause appearing,		
3	IT IS HEREBY ORDERED as follows:		
4	1. The Court retainA jurisdiction of	ver this matter for the purpose of adjudicating	
5	any motion brought by Plaintiff to recover his attorneys' fees and costs ("Fees Motion").		
6	2. Plaintiff shall file any Fees Motion within 45 days of the date of this Order.		
7	7 3. Except as provided for in paragrap	oh 1, the action is dismissed with prejudice.	
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9	IT IS SO ORDERED.		
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12	Z II	SAN ILLSTON ted States District Judge	
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